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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____	:	
In re:	:	Chapter 11 Case No. 08-13555 (JMP)
	:	
LEHMAN BROTHERS HOLDINGS INC.,	:	13 Civ. _____
<i>et al.</i> ,	:	
	:	
Debtors.	:	Jointly Administered
_____	:	

**NOTICE OF MOTION TO WITHDRAW THE REFERENCE BY THE
FEDERAL HOUSING FINANCE AGENCY AND THE FEDERAL
HOME LOAN MORTGAGE CORPORATION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum in Support of the Motion of the Federal Housing Finance Agency (“FHFA”) and the Federal Home Mortgage Corporation (“Freddie Mac”) and the Declaration of Nancy G. Milburn in Support of the Motion

to Withdraw the Reference, pursuant to 28 U.S.C. § 157(d), Rule 5011(a) of the Federal Rules of Bankruptcy Procedure, and Rule 5011-1 of the Local Rules for the United States Bankruptcy Court for the Southern District of New York, FHFA, as Conservator of Freddie Mac, under the Housing and Economic Recovery Act of 2008, 12 U.S.C. § 4501, *et seq.* (2008), and Freddie Mac, by and through their undersigned attorneys, hereby move the United States District Court for the Southern District of New York for entry of an order withdrawing the reference to the Bankruptcy Court of (i) the Motion to Classify and Allow the Claim Filed by the Federal Home Loan Mortgage Corporation (Claim No. 33568) in LBHI Class 3 filed by Lehman Brothers Holdings Inc. (“LBHI”), and (ii) FHFA’s and Freddie Mac’s Opposition to the Motion to Classify. FHFA and Freddie Mac respectfully request such other and further relief as the Court deems just and proper.

FHFA and Freddie Mac have made no prior request to any court for the relief requested by this Motion.

PLEASE TAKE FURTHER NOTICE, that pursuant to Local Civil Rule 6.1 opposition papers, if any, to the relief sought herein must be filed on or before November 1, 2013.

Dated: New York, New York
October 18, 2013

/s/ Michael J. Canning

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/s/ Mark S. Landman

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